

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

NATHAN ROBERTS and FREEDOM TRUCK DISPATCH LLC, on behalf of themselves and all others similarly situated,

*Plaintiffs,*

*v.*

PROGRESSIVE PREFERRED INSURANCE COMPANY; PROGRESSIVE CASUALTY INSURANCE COMPANY; CIRCULAR BOARD LLC,

*Defendants.*

Civil Action No. 1:23-cv-01597

JUDGE PATRICIA A. GAUGHAN  
Magistrate Judge James E. Grimes, Jr.

**MOTION FOR THE ADMISSION,  
*PRO HAC VICE*, OF EFRÉN C.  
OLIVARES AS COUNSEL FOR  
*AMICI CURIAE***

Pursuant to Local Civil Rule 83.5(h), I hereby move for the admission, *pro hac vice*, of Efrén C. Olivares, an attorney at the Southern Poverty Law Center located at 150 E. Ponce de León Ave., Ste. 350, Decatur, GA 30031-1287 and a member in good standing of the Georgia state bar (GA Bar No. 934358), as counsel in this case for *Amici Curiae* The Southern Poverty Law Center, the National Hispanic Bar Association, and Asian Americans Advancing Justice. The declaration of Efrén C. Olivares is filed herewith.

Date: December 21, 2023

Respectfully submitted,

*s/ Efrén C. Olivares*

Efrén C. Olivares (GA Bar No. 934358)  
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**CERTIFICATE OF SERVICE**

I certify that, on December 21, 2023, I electronically transmitted the attached MOTION FOR THE ADMISSION, PRO HAC VICE, OF EFRÉN C. OLIVARES AS COUNSEL FOR *AMICI CURIAE*, its accompanying declaration, and proposed order using the CM/ECF system. Notice of Electronic Filing will be sent to all CM/ECF registrants for this matter.

Signed: s/ Efrén C. Olivares

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*Attorney for Amici Curiae The Southern Poverty Law Center, Hispanic National Bar Association, and Asian Americans Advancing Justice – AAJC*